

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
Brownsville

SOUTHERN DISTRICT OF TEXAS

BROWNSVILLE DIVISION

AUG 02 2013

UNITED STATES OF AMERICA

V

CRIMINAL COMPLAINT

NIETO, NATALIA
A205 144 166
UNITED STATESCASE NUMBER: B-13-687 -MJ

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 08/01/2013 in Cameron County, in the SOUTHERN District of TEXAS defendant, did,

engaged in a conspiracy to violate section 8 USC1324 (a) (1) (A) (ii), knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, and done for the purpose of commercial advantage or private financial gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii),

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I),

in violation of Title 8 United States Code, Section(s) 1324(a)(2)(B)(ii).

I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant attempted to transport into the United States 3 undocumented aliens in a taxi thru the Brownsville Matamoros International Bridge in Brownsville, Texas. The defendant traveled to Matamoros Tamaulipas Mexico from Florida, picked-up the aliens at the bus station, and transported them to the port of entry. The defendant claimed; the aliens were her children, United States citizens born in the state of Florida, and further presented United States Passports on behalf of the aliens bearing the names of LORENA BETANCOURT, ROBERTO BETANCOURT, and EUGENIO ALFREDO BETANCOURT GUTIERREZ to a United States Customs and Border Protection Officer. The undocumented aliens were determined by Customs and Border Protection Officers to be a citizens and nationals of Mexico by birth with no documents to enter and/or reside in the United States. The aliens were identified as Y.R.G 22YOA, D.Y.H 16YOA, and A.Y.H 8YOA. The defendant entered into a conspiracy with the mother of A.Y.H and the husband of Y.R.G to transport the aliens to the state of Florida in violation of law and was to receive monetary payment for her efforts.

Continued on the attached sheet and made a part hereof:

Yes ☒ NoIVAN E LEIJA CBPO
Signature of Complainant

Sworn to before me and subscribed in my presence,

August 2, 2013
Date

at

Brownsville, Texas
City and StateRONALD G. MORGAN, U.S. MAGISTRATE JUDGE
Name & Title of Judicial Officer

Signature of Judicial Officer